

MICHAEL J. GARCIA
United States Attorney for the
Southern District of New York
By: SHARON E. FRASE (SF-4906)
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
Tel. (212) 637-2329

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
UNITED STATES OF AMERICA, :

Plaintiff, :

- v. - : DECLARATION IN SUPPORT OF
: DEFAULT JUDGMENT
: 08 Civ. 1341 (SAS)
\$110,746.00 IN UNITED STATES :
CURRENCY, MORE OR LESS, AND ALL :
PROCEEDS TRACEABLE THERETO, :

Defendant-in-rem. :
-----x

SHARON E. FRASE, pursuant to 28 U.S.C. § 1746, declares
under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the
Office of Michael J. Garcia, United States of Attorney for the
Southern District of New York, attorney for plaintiff herein. I
have responsibility for the above-captioned matter, and as such, I
am familiar with the facts and circumstances of this proceeding.
This declaration is submitted in support of plaintiff's request for
a default judgment in the above-captioned case.

2. On February 11, 2008, the United States commenced a
civil action for the forfeiture of the above-referenced defendant-
in-rem by filing a Verified Complaint. A copy of the Verified
Complaint is attached hereto as Exhibit A and is fully incorporated

by reference herein.

3. On February 12, 2008 notice letters of the Verified Complaint were sent by certified mail, return receipt requested, to Zhu Qiaowen, [REDACTED], New York [REDACTED]; Sansani Mouhama, [REDACTED], Bronx, New York [REDACTED]; and Jimmy Yee, [REDACTED], New York, New York [REDACTED]. These are the only individuals known by the Government to have a potential interest in the defendant-in-rem. A copy of the notice letters are attached hereto as Exhibit B.

4. Notice of the Verified Complaint and in rem warrant against the defendant-in-rem was published on the official government internet site (www.forfeiture.gov) for 30 consecutive days beginning on February 20, 2008. Proof of such publication was filed with the Clerk of this Court on March 27, 2008. A copy of this proof of publication is attached hereto as Exhibit C.

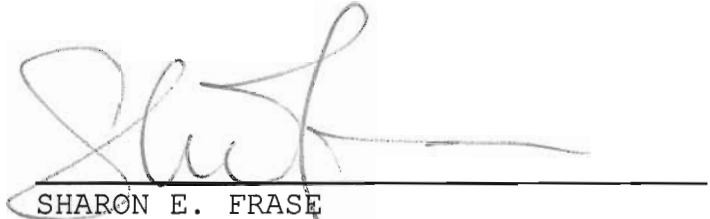
5. Notice of the Verified Complaint and in rem warrant against the defendant-in-rem was published in the New York Post once in each of the three successive weeks beginning on March 28, 2008 and proof of such publication was filed with the Clerk of this Court on May 9, 2008. A copy of this proof of publication is attached hereto as Exhibit D.

6. No claims or answers were filed or made in this action, and no parties have appeared to contest the action to date, and the requisite time periods have expired.

7. Accordingly, the Government requests that the Court enter the proposed Default Judgment.

8. No previous application for the relief requested herein has been sought.

Dated: New York, New York
May 20, 2008

A handwritten signature in dark ink, appearing to read 'Sharon E. Frase', is written over a horizontal line. The signature is fluid and cursive.

SHARON E. FRASE
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
Tel. (212) 637-2329

EXHIBIT A

JUDGE SCHEINDLIN

MICHAEL J. GARCIA

United States Attorney for the
Southern District of New York

By: SHARON E. FRASE (SF-4906)

Assistant United States Attorney

One St. Andrew's Plaza

New York, New York 10007

Tel. (212) 637-2329

08 CV 01341

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA, :

Plaintiff, :

v. : VERIFIED COMPLAINT

\$110,746.00 IN UNITED STATES : 08 Civ.

CURRENCY, MORE OR LESS, AND ALL :

PROCEEDS TRACEABLE THERETO, :

Defendant In Rem. :

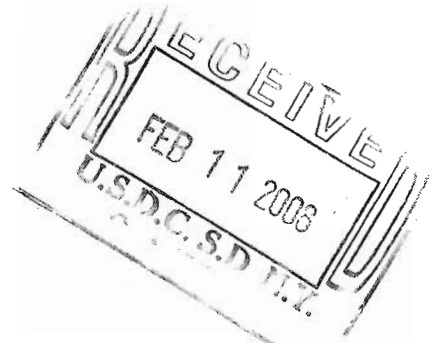
-----X

Plaintiff, United States of America, by its attorney,
MICHAEL J. GARCIA, United States Attorney for the Southern
District of New York, for its complaint alleges as follows:

I. JURISDICTION AND VENUE

1. This action is brought pursuant to 18 U.S.C. § 981
by the United States of America seeking the forfeiture of
\$110,746 in United States currency (the "defendant-in-rem
currency");

2. This Court has jurisdiction pursuant to 28 U.S.C.
§§ 1345 and 1355. Venue is proper under 28 U.S.C. § 1355(a)
because the actions giving rise to forfeiture took place in the
Southern District of New York and the defendant-in-rem currency



was found and seized in the Southern District of New York.

3. The defendant-in-rem currency is presently in the custody of the United States Department of Homeland Security, Bureau of Immigration and Customs Enforcement, on deposit at Wachovia Bank in Edison, New Jersey.

II. PROBABLE CAUSE FOR FORFEITURE

4. On August 5, 2007, the NYPD conducted observations of a vehicle containing three occupants parked at a fire hydrant in a drug prone location in Bronx, NY. The car was being operated by a man identified as ZHU QIAOWEN of [REDACTED] Brooklyn, New York, [REDACTED]. As officers approached the vehicle, they observed an occupant sitting in the back seat of the car, later identified as SANSANI MOUHAMA, attempting to conceal a black shopping bag. Officers asked the driver and occupants why they were parked there and each occupant's explanation was different. The officers then asked all three occupants to exit the vehicle. As the officers observed the inside of the vehicle, they noticed that the aforementioned black shopping bag contained currency. Further inspection of the contents of the bag revealed \$110,746.00 in U.S. currency and \$5,500 in blank money orders. When officers asked the occupants whose money it was, ZHU QIAOWEN stated that it was his. He went on to say that he had won the money at the Showboat Casino in Atlantic City the previous evening. Officers recovered an additional 119 money orders filled out in different names, business records and two pairs of Nike

sneakers from the vehicle. ZHU QIAOWEN then admitted that the Nike sneakers also belonged to him. The Nike sneakers recovered from the vehicle were later identified as counterfeit trademarked merchandise. Upon further questioning, SANSANI MOUHAMA disclosed that he was employed by ZHU QIAOWEN in the business of selling merchandise. He also admitted that his residence contained additional quantities of counterfeit Nike sneakers. After obtaining written consent from SANSANI MOUHAMA, officers searched MOUHAMA's residence on Walton Avenue in Bronx, New York, and recovered a quantity of counterfeit Nike sneakers. Subsequently both ZHU QIAOWEN AND SANSANI MOUHAMA were arrested and charged with violation of NYPL § 165.71, Trademark Counterfeiting in the 3rd Degree, an A-misdemeanor.

5. NYPD seized the \$110,746 in U.S. currency and the \$5000 in money orders because they determined it to be the proceeds from sales of Nike Trademark counterfeit items. NYPD placed the seized funds in evidence bags, and deposited them the NYPD Property Clerk. Then, on September 19, 2007, \$110,746 of the seized defendant funds were adopted by U.S. Customs and Border Protection and deposited into an account at Wachovia Bank in Edison, New Jersey.

CLAIM FOR RELIEF

6. Plaintiff repeats each and every allegation contained in paragraphs 1 through 5 as if fully set forth herein.

7. Pursuant to Title 18, United States Code, Section

981 (a)(1)(A), any property, real or personal, or any property traceable to such property, which is involved in a transaction or attempted transaction in violation of Title 18, United States Code, Section 1956, is subject to forfeiture to the United States.

8. The defendant-in-rem currency is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because there is probable cause to believe that it constitutes property involved in or otherwise traceable to a financial transaction or attempted financial transaction conducted or attempted to be conducted with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Section 1956 (a)(1)(A).

9. The defendant-in-rem currency is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because there is probable cause to believe that it constitutes property involved in or otherwise traceable to a financial transaction conducted or attempted to be conducted with knowledge that the transaction was designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, in violation of Title 18 United States Code, Section 1956 (a)(B)(i).

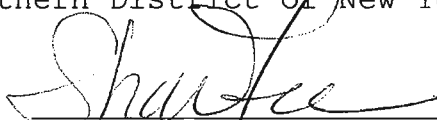
10. By reason of the above, the defendant-in-rem currency became, and is, subject to forfeiture to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(A).

WHEREFORE, plaintiff United States of America prays that process issue to enforce the forfeiture of the defendant-in-rem currency and that all persons having an interest in the defendant-in-rem currency be cited to appear and show cause why the forfeiture should not be decreed, and that this Court decree forfeiture of the defendant-in-rem currency to the United States of America for disposition according to law, and that this Court grant plaintiff such further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Dated: New York, New York
February 11, 2008

MICHAEL J. GARCIA
United States Attorney
Southern District of New York

By:



Sharon E. Frase (SF-4906)
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
Telephone: (212) 637-2329

VERIFICATION

STATE OF NEW YORK)
COUNTY OF NEW YORK)
SOUTHERN DISTRICT OF NEW YORK)


WILLIAM MCCABE, being duly sworn, deposes and says that he is a Detective with the New York City Police Department, and as such has responsibility for the within action; that he has read the foregoing complaint and knows the contents thereof, and that the same is true to the best of his own knowledge, information and belief.

The sources of deponent's information and the grounds of his belief are official records and files of the New York City Police Department and the United States Government, and information obtained directly by deponent during an investigation of alleged counterfeiting activities, including violations of Title 18, United States Code, Section 1956.

Det William McAule

WILLIAM MCCABE
Special Agent
U.S. Customs and Border Protection

Sworn to before me this
11th day of February, 2008


NOTARY PUBLIC

MARCO DASILVA
Notary Public, State of New York
No. 01DA6145603
Qualified in Nassau County
My Commission Expires May 8, 2010

EXHIBIT B

U.S. Department of Justice



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 12, 2008

CERTIFIED MAIL-RETURN

RECEIPT REQUESTED

Zhu Qiaowen

Brooklyn, New York

Re: U.S. v. \$110,746.00 in UNITED STATES CURRENCY
08 Civ. 1341

Dear Mr. Qiaowen:

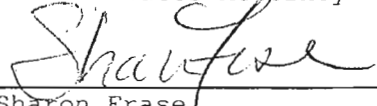
This letter is to advise you that on February 11, 2008, the United States commenced a civil action in the United States District Court for the Southern District of New York seeking the forfeiture of the above-referenced property pursuant to 18 U.S.C. § 981(a)(1)(A). A copy of the complaint in this action is enclosed.

Should you wish to contest the forfeiture, you must do so by filing a claim pursuant to Rule G of the Supplemental Rules for Certain Admiralty and Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure with the Clerk of the Court no later than thirty five (35) days of the date of this letter. Thereafter, within twenty (20) days after filing a claim, you must file your answer to the complaint. This procedure must be followed regardless of any petition for the remission or mitigation of forfeiture which you may have pending, and failure to do so could result in the entry of a default judgment against the property.

Very truly yours,

MICHAEL J. GARCIA
United States Attorney

By:


Sharon Frase
Assistant United States Attorney
Tel. No.: (212) 637-2329
Fax No: (212) 637-0421

Enclosure

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

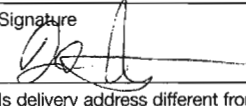
For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
 Street, Apt. No.,
 or PO Box No. Zhu Qiaowen
 City, State, ZIP+4 Brooklyn, New York

PS Form 3800, June 2002 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Received by (Please Print Clearly) _____</p> <p>B. Date of Delivery _____</p>	
<p>1. Article Addressed to:</p> <p><u>Zhu Qiaowen</u> <u>Brooklyn, New York</u></p>		<p>C. Signature <u>X</u> </p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. <u>7003 2260 0000 4034 6793</u></p>			
PS Form 3811, July 1999		Domestic Return Receipt 102595-00-M-0952	

U.S. Department of Justice



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 12, 2008

CERTIFIED MAIL-RETURN
RECEIPT REQUESTED
Sansani Mouhama

[REDACTED]
Bronx, New York [REDACTED]

Re: U.S. v. \$110,746.00 in UNITED STATES CURRENCY
08 Cv. 1341

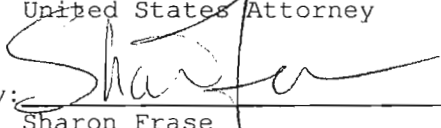
Dear Mr. Mouhama:

This letter is to advise you that on February 11, 2008, the United States commenced a civil action in the United States District Court for the Southern District of New York seeking the forfeiture of the above-referenced property pursuant to 18 U.S.C. § 981(a)(1)(A). A copy of the complaint in this action is enclosed.

Should you wish to contest the forfeiture, you must do so by filing a claim pursuant to Rule G of the Supplemental Rules for Certain Admiralty and Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure with the Clerk of the Court no later than thirty five (35) days of the date of this letter. Thereafter, within twenty (20) days after filing a claim, you must file your answer to the complaint. This procedure must be followed regardless of any petition for the remission or mitigation of forfeiture which you may have pending, and failure to do so could result in the entry of a default judgment against the property.

Very truly yours,

MICHAEL J. GARCIA
United States Attorney

By: 
Sharon Frase
Assistant United States Attorney
Tel. No.: (212) 637-2329
Fax No: (212) 637-0421

Enclosure

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To

Sansani Mouhama

Street, Apt. No.,
or PO Box No.

Bronx, New York

City, State, ZIP+4

PS Form 3800, June 2002 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to:</p> <p>Sansani Mouhama</p> <p>Bronx, New York</p>	<p>A. Received by (Please Print Clearly) B. Date of Delivery</p> <p>Sansani Mouhama</p> <p>C. Signature</p> <p><input checked="" type="checkbox"/> X <input type="checkbox"/> Agent</p> <p><input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes</p> <p>If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number: 7003 2260 0000 4034 7028</p>	

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

U.S. Department of Justice



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 12, 2008

CERTIFIED MAIL-RETURN
RECEIPT REQUESTED
Jimmy Yee, CPA

New York, New York

Re: U.S. v. \$110,746.00 in UNITED STATES CURRENCY
08 Cv. 1341

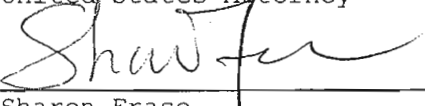
Dear Mr. Yee:

This letter is to advise you that on February 11, 2008, the United States commenced a civil action in the United States District Court for the Southern District of New York seeking the forfeiture of the above-referenced property pursuant to 18 U.S.C. § 981(a)(1)(A). A copy of the complaint in this action is enclosed.

Should your client wish to contest the forfeiture, you must do so by filing a claim pursuant to Rule G of the Supplemental Rules for Certain Admiralty and Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure with the Clerk of the Court no later than thirty five (35) days of the date of this letter. Thereafter, within twenty (20) days after filing a claim, you must file your answer to the complaint. This procedure must be followed regardless of any petition for the remission or mitigation of forfeiture which you may have pending, and failure to do so could result in the entry of a default judgment against the property.

Very truly yours,

MICHAEL J. GARCIA
United States Attorney

By: 
Sharon Frase
Assistant United States Attorney
Tel. No.: (212) 637-2329
Fax No: (212) 637-0421

Enclosure

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To

Jimmy Yee

Street, Apt. No.,
or PO Box No. [REDACTED]

City, State, ZIP+4 New York, New York [REDACTED]

PS Form 3800, June 2002 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jimmy Yee

New York, New York [REDACTED]

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

HENRY

2/26/2008

C. Signature

X

[Signature]

☐ Agent☐ Addressee

D. Is delivery address different from item 1?

☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article

7003 2260 0000 4034 7035

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	08 CV. 1341 (SAS)
)	
US v. \$110,746.00 in United States)	
Currency)	
)	
Defendant.)	

DECLARATION OF PUBLICATION

Notice of Civil Forfeiture was posted on an official government internet site (www.forfeiture.gov) for at least 30 consecutive days, beginning on February 20, 2008, as required by Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, as evidenced by Attachment 1.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 27, 2008.

MICHAEL J. GARCIA
UNITED STATES ATTORNEY

By: Sharon Frase
Sharon E. Frase
Assistant United States Attorney

Attachment 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
COURT CASE NUMBER: 08 CV. 1341(SAS); NOTICE OF FORFEITURE ACTION

Pursuant to 18 USC 981, the United States filed a verified Complaint for Forfeiture against the following property:

\$110,746.00 in United States Currency (07-ICE-000878), which was seized from Zhu Qiaowen on August 05, 2007 at a parked vehicle, located in Bronx, NY

Any person claiming a legal interest in the Defendant Property must file a verified Claim with the court within 60 days from the first day of publication (February 20, 2008) of this Notice on this official government internet web site and an Answer within 20 days thereafter. Title 18, United States Code, Section 983(h)(1) permits a court to impose a civil fine on anyone asserting an interest in property which the court determines was frivolous.

The verified Claim and Answer must be filed with the Clerk of the Court, United States District Court, 500 Pearl Street, Room 120, New York, NY 10007, and copies of each served upon Assistant United States Attorney Sharon E. Frase, One St. Andrew's Plaza, New York, NY 10007, or default and forfeiture will be ordered. See, 18 U.S.C. § 983(a)(4)(A) and Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

Advertisement Certification Report

The Notice of Publication was available on the www.forfeiture.gov web site for at least 18 hours per day between February 20, 2008 and March 20, 2008. Below is a summary report that identifies the uptime for each day within the 30-day period and reports the results of the web monitoring system's daily check that verifies that the advertisement was available each day.

US v. \$110,746.00 in United States Currency

Court Case No: 08 CV. 1341(SAS)

For Asset 07-ICE-000878 \$110,746.00 in United States

ID(s): Currency

Consecutive Calendar Day Count	Date Advertisement Appeared on the Web Site	Total Hours Web Site was Available during Calendar Day	Verification that Advertisement existed on Web Site
1	02/20/2008	23.4	Verified
2	02/21/2008	23.4	Verified
3	02/22/2008	23.6	Verified
4	02/23/2008	22.5	Verified
5	02/24/2008	23.6	Verified
6	02/25/2008	23.6	Verified
7	02/26/2008	23.3	Verified
8	02/27/2008	23.7	Verified
9	02/28/2008	23.0	Verified
10	02/29/2008	23.2	Verified
11	03/01/2008	23.0	Verified
12	03/02/2008	23.0	Verified
13	03/03/2008	23.3	Verified
14	03/04/2008	21.8	Verified
15	03/05/2008	23.5	Verified
16	03/06/2008	22.7	Verified
17	03/07/2008	23.6	Verified
18	03/08/2008	23.5	Verified
19	03/09/2008	22.6	Verified
20	03/10/2008	21.5	Verified
21	03/11/2008	22.7	Verified
22	03/12/2008	22.8	Verified
23	03/13/2008	22.8	Verified
24	03/14/2008	22.5	Verified
25	03/15/2008	22.8	Verified
26	03/16/2008	22.8	Verified
27	03/17/2008	22.7	Verified
28	03/18/2008	22.8	Verified
29	03/19/2008	22.8	Verified
30	03/20/2008	22.8	Verified

Additional log information is available and kept in the archives for 15 years after the asset has been disposed. For more information, please contact Sharon E. Frase in the Southern District of New York at 212-637-2329.

EXHIBIT D

Department of the Treasury
Federal Law Enforcement Agencies
PROCESS RECEIPT AND RETURN

PLAINTIFF UNITED STATES OF AMERICA		COURT CASE NUMBER 08 Cv 1341	
DEFENDANT \$110,746.00 in United States Currency		TYPE OF PROCESS Publish Notice	
SERVE AT	Charles Ciraco 1100 Raymond Blvd., 5th Fl. Newark, NJ 07102		
Send NOTICE OF SERVICE copy to Requester: U.S. ATTORNEY'S OFFICE- SDNY ONE SAINT ANDREWS PLAZA NEW YORK, NEW YORK 10007 ATTN: Tony Dulgerian		Number Of Process To Be Served In This Case.	
		Number Of Parties To Be Served In This Case.	
		Check Box If Service Is On USA	
SPECIAL INSTRUCTIONS or OTHER INFORMATION TO ASSIST IN EXPEDITING SERVICE FP&F or AFTRAK # Please publish the following for three consecutive weeks in a newspaper of general circulation. Please return to FSA Law Clerk Tony Dulgerian, 212-637-2404			
Signature of Attorney or other Originator requesting service on behalf of AUSA Sharon Frase		[X] Plaintiff [] Defendant	Telephone No. 212-637-2329
		Date February 22, 2008	
SIGNATURE OF PERSON ACCEPTING PROCESS: <i>[Signature]</i> FREE			Date <i>05/10/08</i>
SPACE BELOW FOR USE OF TREASURY LAW ENFORCEMENT AGENCY			
I acknowledge receipt for the Total # of Process Indicated.	District of Origin No. _____	District to Serve No. _____	SIGNATURE OF AUTHORIZED TREASURY AGENCY OFFICER:
Date			
I hereby Certify and Return That I [] PERSONALLY SERVED, [] HAVE LEGAL EVIDENCE OF SERVICE, [X] HAVE EXECUTED AS SHOWN IN "REMARKS", the Process Described on the Individual, Company, Corporation, Etc., At The Address Shown Above or at the Address Inserted Below.			
[] I HEREBY CERTIFY AND RETURN THAT I AM UNABLE TO LOCATE THE INDIVIDUAL, COMPANY, CORPORATION, ETC. NAMED ABOVE.			
NAME & TITLE of Individual Served If not shown above: J. Pollard Forfeiture Specialist		[] A Person of suitable age and discretion then residing in the defendant's usual place of abode.	
ADDRESS: (Complete only if different than shown above.)		Date of Service	Time of Service [] AM [] PM
		Signature, Title and Treasury Agency	
REMARKS: <i>Legal notice published in New York Post on March 28, 2008, April 4, 2008, and April 11, 2008.</i>			

TD F 90-22.48 (6/96)

Make (5) copies after form is signed. SEND ORIGINAL + 4 COPIES to TREASURY AGENCY. Retain Copy #5 for your file.

RETURNED COPY

State of New York
COUNTY OF NEW YORK

SS:

628895

INGRID CHRISTIANI

being duly sworn,
says that he/she is the principal Clerk of the Publisher of the

New York Post

a daily newspaper of general circulation printed and published in the English language, in the County of New York, State of New York; that advertisement hereto annexed has been regularly published in the said "NEW YORK POST" once,

on the 28 day of March, 2008

on the 04 day of April, 2008

on the 11 day of April, 2008

USA-335-100-NOTICE OF CIVIL FORFEITURE PROCEEDING Rev. 11/94
UNITED STATES DISTRICT COURT,
SOUTHERN DISTRICT OF NEW YORK

On February 11, 2008, the United States of America commenced a civil action demanding forfeiture thereof pursuant to 18 U.S.C. § 981 for \$110,746.00 in U.S. Currency. Notice is hereby given that all persons claiming the same or knowing or having anything to say why the same should not be forfeited pursuant to the prayer of said complaint, must file their claim in accordance with Rule G from the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions with the Clerk of the Court, in Room 120, United States Court House, 500 Pearl Street, New York, New York, by May 12, 2008 which is 30 days after the last publication of this action or within such additional time as may be allowed by the Court, and must serve their answers within 20 days after the filing of their claims, or default and forfeiture will be ordered. Any person with an interest in the property may also wish to file a petition for remission or mitigation of the forfeiture, as provided for in Title 28, Code of Federal Regulations, and failure to file such a petition may affect any rights that a person claiming an interest in the property may have with respect to this property.
FOR NOTICE OF PUBLICATIONS GO TO: WWW.FORFEITURE.GOV

On December 1, 2006, Rule G of the Supplemental Rules for Certain Admiralty and Maritime Claims, part of the Federal Rules of Civil Procedure, became effective. This new rule now governs procedures for civil and criminal asset forfeiture actions in the federal courts.

Notice of judicial forfeiture actions has traditionally been published in newspapers. The new rule now permits publication of forfeiture notices on a government Internet site (www.forfeiture.gov), and this site incorporates these forfeiture notices that have been traditionally published in newspapers.

This site is currently fully operational, civil and criminal forfeiture notices will continue to be published in newspapers for a period of time before newspaper publication is eventually abandoned in favor of this website. The website contains a comprehensive list of pending notices of both civil and criminal forfeiture actions in United States District Courts around the country.

Dated: New York, New York,
March, 2008

MICHAEL J. GARCIA
United States Attorney

4601 - FINES, PENALTIES
& FORFEITURES
APR 15 A 9:32

BYRON STEVENS
Notary Public, State of New York
No. 01ST6117803
Qualified in New York County
Commission Expires November 1, 2008

Ingrid Christiani

Sworn to before me this 11 day of April, 2008

Notary Public

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

- v. -

\$110,746 IN UNITED STATES CURRENCY,

Defendant-in-rem.

DECLARATION IN SUPPORT OF DEFAULT JUDGMENT
08 Civ. 1341 (SAS)

MICHAEL J. GARCIA
United States Attorney for the
Southern District of New York
Attorney for the United States of America
One St. Andrew's Plaza
New York, New York 10007

SHARON E. FRASE
Assistant United States Attorney
-Of Counsel-